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March 22, 2024

VIA ELECTRONIC FILING

Honorable Zahid N. Quraishi
United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Andy Kim, et al. v. Hanlon, et al.
Docket No. 3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi:

This office represents Monmouth County Clerk Christine Giordano Hanlon. Our client joins in the correspondence (Dkt. No. 166) filed by the Genova Burns law firm on behalf of its clients as to the issue of the bond Plaintiffs must post in the event Your Honor grants their motion for a preliminary injunction.

As indicated by way of our client's testimony before Your Honor on March 18, 2024, we do not know if the ES&S ExpressVote XL machines utilized in Monmouth County are capable of being programmed for "block ballot" designs.

The only rough estimate that our client can provide at this time is that to hold an entirely vote by mail primary election similar to that conducted during the Covid-19 pandemic would minimally cost \$1.1-1.2 million.

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This estimate is only for our client's office, which is not inclusive of costs that would be required to be covered by the Superintendent of Elections and Board of Elections that are not parties to this matter.

Respectfully submitted,

SPIRO HARRISON & NELSON LLC

By: 

Brian M. Nelson

cc. All Counsel of Record (via electronic filing)